

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
52 Duane Street-10th Floor, New York, NY 10007  
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton  
Executive Director

*Southern District of New York*  
Jennifer L. Brown  
Attorney-in-Charge

February 17, 2022

**VIA ECF**

Honorable Denise L. Cote  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: United States v. William Jimenez  
20 Cr. 122 (DLC)**

Dear Judge Cote:

With the consent of the Government, I write to request a brief adjournment of Mr. Jimenez's March 10 sentencing hearing to the first or second week of April. I am lead counsel in an ongoing trial that is expected to continue through next week, overlapping with the due dates for Mr. Jimenez's sentencing submissions. Critically, I need additional time to consult with the Government and meet with Mr. Johnson in person about the impact of the victim's death on his case. As the Court is aware, the Metropolitan Detention Center only recently reopened to legal visits after closing due to the spread of Omicron and in accordance with a National Bureau of Prisons lockdown. The Government has no objection to this request and consents to proceeding the first or second week of April.

Respectfully submitted,

/s/ Zawadi S. Baharanyi, Esq.

Zawadi S. Baharanyi, Esq.

cc: AUSA Jacob Fiddelman

*The sentence is adjourned to  
4/8/22 at 10<sup>00</sup> am. Defense  
submissions are due 3/31;  
Government submissions are  
due 4/5/22. J. Fiddelman  
2/18/22*